

<p>Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address</p> <p>DAVID B. GOLUBCHIK (State Bar No. 185520) TODD M. ARNOLD (State Bar No. 221868) LEVENE, NEALE, BENDER, YOO &amp; GOLUBCHIK L.L.P. 2818 La Cienega Avenue Los Angeles, California 90034 Telephone: (310) 229-1234 Facsimile: (310) 229-1244 Email: dbg@lnbyg.com; tma@lnbyg.com</p> <p>Proposed Counsel for Debtor and Debtor in Possession</p> <p><input type="checkbox"/> Debtor appearing without an attorney <input checked="" type="checkbox"/> Attorney for Debtor(s) (Proposed)</p>	<p>FOR COURT USE ONLY</p>
<p align="center"><b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b></p>	
<p>In re:</p> <p>CRESTLLOYD, LLC,</p> <p align="right">Debtor(s).</p>	<p>CASE NO.: 2:21-bk-18205-DS CHAPTER: 11</p> <p align="center"><b>DEBTOR'S MOTION TO EXTEND TIME TO FILE CASE OPENING DOCUMENTS (with supporting declaration) [FRBP 1007(c), LBR 1007-1(b)]</b></p>

1. The Debtor requests an extension of time under FRBP 1007(c) and LBR 1007-1(b) to file the following:

- ☒ One or more schedules (A/B – J)      ☐ Chapter 13 Plan      ☒ Statement of Financial Affairs  
☐ Statement of Current Monthly Income (B 122A, B 122B, B 122C)  
☐ Debtor's Certification of Employment Income  
☒ Other (*specify*):  
 Other initial filing documents to accompany the Debtor's Schedules and Statement of Financial Affairs ("SOFA"), including, but not limited to List of Equity Holders, Statement of Related Cases, Compensation Statement of Attorney for Debtor, and Corporate Ownership Statement.

**Note:** Do not use this form to request an extension of time to obtain the credit counseling required under 11 U.S.C. § 109(h)(1). If the Debtor did not obtain credit counseling before filing the petition, any requests for an extension of time to satisfy the requirement must be made with a certification of exigent circumstances explaining the reason(s) for such a request.

2. Date bankruptcy case filed: 10/26/2021
3. Date of § 341(a) meeting of creditors: 11/30/2021
4. Debtor requests extension to and including (extension deadline) (*date*): 11/23/2021

5. Declaration regarding the reason(s) for extension (*explain*):

Before the Petition Date, on 7/2/21, one of the Debtor's secured creditors sought and obtained the appointment of a receiver (the "Receiver") for the Debtor's real property (the "Property"), which is the Debtor's most valuable asset with an estimated value of \$325 million.

Since the Petition Date, the Debtor has been/will be dealing with a number of issues, including, among others, the following: (1) taking actions to comply with the operating requirements under the Bankruptcy Code, the Bankruptcy Rules, and the Guidelines of the United States Trustee (the "UST"), (2) preparing the Debtors' 7-Day Package for submission to the UST and gathering documents and information related thereto, (3) dealing with efforts to potentially obtain DIP financing and to provide adequate assurance to utility companies, and (4) reviewing applications to employ professionals.


More importantly, the Debtor has been seeking to obtain turnover of the Property from the Receiver pursuant to § 543 and, at minimum, documents and information related to the Property since the placement of the Receiver, which documents and information are required to prepare complete, accurate Schedules, SOFA, and related documents, including in regard to, among other things, (1) the bank accounts held by the Receiver and the balances thereof as of the Petition Date, (2) any claims against the Debtor incurred by the Receiver, (3) any executory contracts or unexpired leases entered into by the Receiver on behalf of the Debtor, (4) income received by the Receiver on behalf of the Debtor, (5) payments made within 90 days of the Petition Date by the Receiver on behalf of the Debtor, and (6) information regarding any insurance policies placed by the Receiver on behalf of the Debtor and any claims against such policies.

Based on the foregoing, the Debtor needs a short amount of additional time to complete, review, and file its Schedules, SOFA, and related initial filings, which will occur in advance of the Section 341(a) meeting of creditors.

In consideration of the foregoing, the Debtor submits that good cause exists for the short requested extension of time and that it should be granted.

Debtor acknowledges that denial of this motion or failure to file the required documents by the extended deadline may result in dismissal of the case and a determination that the Debtor is not eligible for any bankruptcy relief for 180 days.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/09/2021  
Date  
  
Sierra Constellation Partners LLC, as  
Manager, by Lawrence R. Perkins, as its  
Authorized Signatory

\_\_\_\_\_  
Date Signature of Joint Debtor, if applicable

Presented by:

/s/ Todd M. Arnold

\_\_\_\_\_  
DAVID B. GOLUBCHIK  
TODD M. ARNOLD  
LEVENE, NEALE, BENDER, YOO  
& GOLUBCHIK L.L.P.  
Proposed Counsel for Debtor and Debtor in Possession

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled: **DEBTOR'S APPLICATION TO EXTEND TIME TO FILE CASE OPENING DOCUMENTS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 11/09/2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

The case trustee and U.S. Trustee will be automatically served by the Court at their email address.

**See NEF for confirmation of electronic transmission to the U.S. Trustee and any trustee in this case, and to any attorneys who receive service by NEF.**

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On *(date)* 11/09/2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* 11/09/2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>11/09/2021</u>	<u>Lourde Cruz</u>	<u>/s/ Lourdes Cruz</u>
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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- Lindsey L Smith lls@lnbyb.com, lls@ecf.inforuptcy.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Jessica Wellington jwellington@bg.law, ecf@bg.law

Label Matrix for local noticing  
0973-2  
Case 2:21-bk-18205-DS  
Central District of California  
Los Angeles  
Tue Nov 9 10:28:54 PST 2021

Los Angeles Division  
255 East Temple Street,  
Los Angeles, CA 90012-3332

BMC West LLC  
3250 N. San Fernando Rd.  
Los Angeles, CA 90065-1415

Bradford Sheet Metal  
4164 Sopp Road  
Mojave, CA 93501-7196

C.G.S. Custom Glass Specialists  
4536 Ish Drive  
Simi Valley, CA 93063-7666

Calgrove Rentals Inc.  
Guadalupe Gomez, President  
456 Glenoaks Blvd.  
San Fernando, CA 91340-1833

City of Los Angeles  
Mike Feuer, City Attorney  
City Hall East, Suite 800  
Los Angeles, CA 90012

Conejo Recreation and Park District  
403 W. Hillcrest Drive  
Thousand Oaks, CA 91360-4223

County of Los Angeles  
Wildlife Corridor and Protection  
4745 Mangels Blvd.  
Fairfield, CA 94534-4175

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Wolf, Rifkin, Shapiro, et al.  
11400 W. Olympic Blvd., 9th Fl.  
Los Angeles, CA 90064-1582

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c/o Sierra Constellation Partners LLC  
355 S. Grand Avenue Suite 1450  
Los Angeles, CA 90071-3152

Alvandi Law Group, P.C.  
Gil Alvandi  
2955 Main St. Suite 110  
Irvine, CA 92614-2527

BMC West LLC  
David Filtman, CEO  
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Raleigh, NC 27609-8142

Branden Williams  
257 N. Cannon Dr., 2nd Fl.  
Beverly Hills, CA 90210-4361

CAD Stone Works Inc.  
4533 Van Nuys Bl. #201  
Sherman Oaks, CA 91403-2950

Caprenos Inc.  
Cindee Wood Authorized Agent  
4345 Murphy Canyon Road #200  
San Diego, CA 92123-4362

Clerk of the Governing Board,  
Mount. Rec. & Cons. Auth.  
5750 Ramirez Canyon  
Malibu, CA 90265-4474

County of Los Angeles  
Local Fire Prevention Measure  
4745 Mangels Blvd.  
Fairfield, CA 94534-4175

Creative Art Partners  
6542 Hayes Dr.  
Los Angeles, CA 90048-5320

Davidson Accountancy Corp.  
William N. Davidson, CPA  
14011 Ventura Blvd., Ste. 302  
Sherman Oaks, CA 91423-5226

Interno Investment, Inc.  
4-95 Kandaheer,  
Mont Tremblant  
Quebec Canada

American Truck & Tool Rentals Inc.  
Tom Murray, CEO and President  
88 W. Victoria St.  
Long Beach, CA 90805-2157

Biabani & Associates, Inc.  
1600 Sawtelle Bl #104  
Los Angeles, CA 90025-3197

Buchalter, APC  
Jeffrey S. Wruble  
1000 Wilshire Blvd., Suite 1500  
Los Angeles, CA 90017-1730

Calgrove Rentals Inc.  
21627 Roscoe Bl.  
Canoga Park, CA 91304-4159

Centurion Air, LLC  
13932 Arrow Creek Road  
Draper, UT 84020-9295

Compass  
Aaron Kirman  
9378 Wilshire Blvd. #200  
Beverly Hills, CA 90212-3167

County of Los Angeles  
MRCA-Brush Fire Clear g Dist #1  
200 North Main Street, 16th Fl  
Los Angeles, CA 90012-4110

Crest Real Estate  
11150 Olympic Bl. #700  
Los Angeles, CA 90064-1825

Dennis Palma  
146 Beach Way  
Monterey, CA 93940-3436

Draken Private Security  
Jaime Salanga  
633 West 5th St.  
Los Angeles, CA 90071-2005

Draken Security  
8225 Encino Ave  
Northridge, CA 91325-4313

Employment Development Dept.  
Bankruptcy Group MIC 92E  
P.O. Box 826880  
Sacramento, CA 94280-0001

Main Document Page 6 of 7

Franchise Tax Board  
Bankruptcy Section, MS: A-340  
P.O. Box 2952  
Sacramento, CA 95812-2952

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Attn: Eugene M. Leydiker  
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Los Angeles, CA 90010-3838

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New York, NY 10001-1910

Hilton & Hyland Real Estate  
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Beverly Hills, CA 90210-4361

Inferno Investment Inc.  
Julien Remillard, President  
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Quebec J8E 1E2 Canada

Internal Revenue Service  
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Philadelphia, PA 19101-7346

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Miami, FL 33137-3630

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Francisco Gonzalez, CEO  
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Corona, CA 92882-8502

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Los Angeles, CA 90067-4308

JMS Air Conditioning  
and Appliance Services, Inc.  
7640 Burnet Ave.  
Van Nuys, CA 91405-1005

Jabs Pools and Spas, LLC  
8055 Matilija Ave.  
Panorma City, CA 91402-6126

Jose Napoleon Garcia  
1525 N. Detroit St., #5  
Los Angeles, CA 90046-3233

KN Coating  
201 E. Tamarack Ave  
Inglewood, CA 90301-2714

Kennco Plumbing, Inc.  
Robert L. Kennedy, Jr., CEO  
21366 Placerita Canyon Rd.  
Newhall, CA 91321-1846

Kennco Plumbing, Inc.  
Robert L. Kennedy, Jr., CEO  
26575 Ruether Ave.  
Santa Clarita, CA 91350-2622

LA DWP  
P.O. Box. 30808  
Los Angeles, CA 90030-0808

Lanes Management Services  
Theodore Lanes  
655 Deep Valley Drive 125-P  
Palos Verdes Peninsula, CA 90274-3615

(p)LOS ANGELES COUNTY TREASURER AND TAX COLLE  
ATTN BANKRUPTCY UNIT  
PO BOX 54110  
LOS ANGELES CA 90054-0110

Made by TSI, Inc.  
1840 Jefferson Ave., Apt 303  
Miami Beach, FL 33139-2461

Made by TSI, Inc.  
888 Biscayne Blvd #209  
Miami, FL 33132-1588

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112 1/2 North 20th St.  
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Martin Aguirre  
c/o Nathan D. McMurry  
8050 N. Palm Ave. Ste. 300  
Fresno, CA 93711-5510

Midland Contractors, Inc.  
Po Box 8312  
Van Nuys, CA 91409-8312

Moises Lopez  
141 S. Ave. 55 Apt. 40  
Los Angeles, CA 90042-4635

Nile Niami  
c/o Hamid R. Rafatjoo  
1800 Avenue of the Stars, 12th Fl.  
Los Angeles, CA 90067-4201

Parker Resnik  
Structural Engineering  
1927 Pontius Ave  
Los Angeles, CA 90025-5611

Parquet by Dian  
Dima Efros, CEO  
16601 S. Main Street  
Gardena, CA 90248-2722

Powertek Electric Inc.

Mike Moshrefi, CEO

28364 S. Western Ave. # 414

Rancho Palos Verdes, CA 90275-1434

Public Insurance Agency Inc.  
Main Document Page 7 of 7  
10941 W. Pico Bl.

Los Angeles, CA 90064-2117

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Michael Rolls, CEO

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Ventura, CA 93004-3559

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SierraConstellation Partners LLC

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Los Angeles, CA 90071-3152

(p)CALIFORNIA STATE BOARD OF EQUALIZATION

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SACRAMENTO CA 94279-0029

The Beverly Hills Estates, Inc.

Branden Williams

8878 Sunset Blvd., West

West Hollywood, CA 90069-2108

United States Trustee (LA)

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Los Angeles, CA 90017-3560

Vesta aka Showroom Interiors, LLC

8905 Rex Road

Pico Rivera, CA 90660-3799

Vista Sotheby's Int'l. Realty

Chris Adlam

16 Malaga Cove Plaza

Palos Verdes Peninsula, CA 90274-1306

West Coast Gates

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Inglewood, CA 90301-2007

West Valley Green Landscaping, Inc.

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Panorama City, CA 91402-1222

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Todd M Arnold

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Los Angeles, CA 90034-2645

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Los Angeles County Tax Collector

225 N. Hill Street # 1

Los Angeles, CA 90012

(d)Los Angeles County Tax Collector

PO Box 54018

Los Angeles, CA 90054

State Board of Equalization

Acct. Analysis & Control MIC 29

POB 942879

Sacramento, CA 94279

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.